

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
JAWARA GRIFFIN
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Jawara_Griffin@fd.org
6 Attorney for Tamarion Keandre Williams
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 TAMARION KEANDRE WILLIAMS,
15 Defendant.
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Case No. 2:21-cr-00061-JCM-VCF

STIPULATION TO CONTINUE
MOTION DEADLINES
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Daniel E. Clarkson, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Jawara Griffin, Assistant Federal Public Defender, counsel for Tamarion Keandre
21 Williams, that the pretrial motions and notices of defense currently due on June 22, 2021 be
22 vacated and reset to July 22, 2021.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including August 5, 2021, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
26 shall have to and including August 12, 2021, to file any and all replies to dispositive motions.

The Stipulation is entered into for the following reasons:

1. Counsel for the defendant needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the second stipulation to continue filed herein.

DATED this 22nd day of June, 2021.

RENE L. VALLADARES
Federal Public Defender

/s/ Jawara Griffin

By _____
JAWARA GRIFFIN
Assistant Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Daniel E. Clarkson

By _____
DANIEL E. CLARKSON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TAMARION KEANDRE WILLIAMS,

7 Defendant.

Case No. 2:21-cr-00061-JCM-VCF

8 FINDINGS OF FACT, CONCLUSIONS
9 OF LAW AND ORDER

10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to conduct investigation in this
14 case in order to determine whether there are any pretrial issues that must be litigated and
15 whether the case will ultimately go to trial or will be resolved through negotiations.

16 2. The defendant is incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to be able to effectively and
20 complete investigation of the discovery materials provided.

21 5. Additionally, denial of this request for continuance could result in a miscarriage
22 of justice. The additional time requested by this Stipulation is excludable in computing the time
23 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
24 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
25 Section 3161(h)(7)(B)(i), (iv).

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